

# UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

CASE NUMBER:

2005-M-0455 RBC

EDISON JARAMILLO, a.k.a. Roberto Feliciano, LUIS  
FERNANDO CARVAJAL, a.k.a. "El Colo," and CARMEN  
LOPERA, a.k.a. Christina Lopera

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From in or about February 2005 through April 21, 2005 in Suffolk and Norfolk counties, in the District of Massachusetts and elsewhere, defendants did, (Track Statutory Language of Offense)

knowingly and intentionally conspire with one and other and with other persons unknown, to distribute 100 grams or more of heroin, a Schedule I controlled substance,

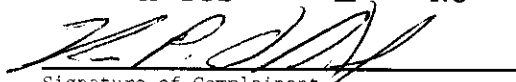
in violation of Title 21 United States Code, Section(s) 841(a)(1), (b)(1)(A)(i) and 846

I further state that I am a(n) Drug Enforcement Administration and that this complaint is based on the following facts: Official Title

See Attached Affidavit of DEA TFA Kevin O'Neil

Continued on the attached sheet and made a part hereof:

X Yes ☐ No



Signature of Complainant  
Task Force Agent  
Drug Enforcement Administration


Sworn to before me and subscribed in my presence,

April 21, 2005 at  
Date

Boston, Massachusetts  
City and State

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer



Signature of Judicial Officer

DR. ROBERT E. COLLINGS  
UNITED STATES MAGISTRATE JUDGE  
United States District Court  
in Joseph Moakley United States Courthouse  
1 Courthouse Way, Suite 6420  
Boston, Massachusetts 02210

**AFFIDAVIT OF TASK FORCE AGENT KEVIN O'NEIL**

Task Force Agent Kevin O'Neil deposes and states as follows:

**A. INTRODUCTION**

1. I am a Task Force Agent with the United States Drug Enforcement Administration ("DEA") and have been so assigned for the past four years. I am also a State Trooper with the Massachusetts State Police and have been so employed for the past thirteen years. I have been assigned to the Boston Office of the New England Division of the DEA for the past four years. Prior to that I was assigned to the canine unit of the State Police for over five years, and at the Framingham Barracks for three years. My primary duties at the DEA include the investigation of organized narcotics traffickers. I have been involved in approximately one-hundred investigations involving the organized domestic and international importation and distribution of kilogram quantities of cocaine and heroin. Approximately ten of those investigations involved the use of court ordered electronic surveillance. I was the affiant for Federal Title III applications on approximately three of those investigations. Those investigations resulted in the arrest and the prosecution of various distribution, transportation, and supply groups based in Colombia and the Dominican Republic operating in the states of Massachusetts and New York. Those investigations resulted in the seizure of large quantities of drugs. I have testified in the grand jury and in numerous trials in the federal and state courts

including the United States District Court for the District of Massachusetts, as well as state district and superior courts.

**This Investigation**

2. I have personally participated in the investigation of the subjects identified in this Affidavit since November 2004. I am familiar with the facts and circumstances of this investigation from oral and written reports made to me by other Agents of the DEA, other federal, state and local law enforcement agencies, oral and written reports of conversations and meetings with numerous confidential sources, a review of consensually recorded conversations, and a review of wire intercepted conversations as well as my own personal participation in the investigation which includes surveillance and independent investigation.

3. I am submitting this affidavit in support of a criminal complaint charging (1) LUIS FERNANDO CARVAJAL, a.k.a. "El Colo," (2) EDISON JARAMILLO, a.k.a. "Roberto Feliciano," and (3) CARMEN LOPERA, a.k.a. "Christina Lopera" (hereinafter the "Target Subjects") with conspiracy to distribute 100 grams or more of heroin, a Scheduled I controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B)(i).

4. This affidavit includes a summary of events that I am personally familiar with as well as the observations and knowledge related to me by other DEA agents, troopers from the Massachusetts State Police, Boston Police Department Officers and Detectives and other law enforcement personnel who have been

working on this investigation. This affidavit does not set forth all the facts developed during the course of this investigation. Rather, it sets forth only those facts that are necessary and sufficient to establish probable cause to believe that the Target Subjects have committed the above described controlled substance violations.

#### **Overview of Case**

5. Beginning in approximately August 2004, the DEA in Boston, MA and the Massachusetts State Police ("MSP") began an investigation into the drug trafficking activities of LEONEL GUERRA-PIMENTEL, a.k.a. Jose Alfredo Santiago, a.k.a. "Leo" (GUERRA). I and other law enforcement agents analyzed telephone toll records related to seizures of cocaine in Ohio and Texas. Based on these records, I believed that these seizures of cocaine were connected to telephones being utilized by GUERRA. Beginning in early November 2004, DEA and other law enforcement agents conducted extensive surveillance of GUERRA, ANGEL VASQUEZ, a.k.a. "Robertico," and others in and around the Boston, MA area.

6. On February 17, 2005, the Honorable Nancy Gertner, U.S. District Court Judge for the District of Massachusetts, signed an order authorizing the interception of wire communications over two telephones: (a) cellular telephone number (617) 224-6074, which is a Nextel cellular telephone, bearing International Mobile Subscriber Identifier ("IMSI") number 316010015606339 and Urban Fleet Mobile Identifier ("UFMI") or "direct-connect" number 180\*188084\*3 and subscribed to

Miosotis Cannon, 1 Horan Way, Apt. 267, in Jamaica Plain, MA ("TARGET TELEPHONE # 1") and; (b) cellular telephone number (857) 222-9364, which is a Pre-Paid T-Mobile cellular telephone bearing IMSI number 310260112114218 and subscribed to "Leo Customer" with no further subscriber information provided ("TARGET TELEPHONE # 2") (hereinafter collectively the "TARGET TELEPHONES"). On March 18, 2005, the Honorable Patti B. Saris (in lieu of Chief Judge Young) signed an order extending the authorization over the TARGET TELEPHONES.

7. In the paragraphs below, I have set forth a summary of a number of the relevant intercepted telephone calls over the TARGET TELEPHONES. I have also included summaries of telephone calls recorded from the Norfolk House of Corrections in Dedham, MA. I have not detailed herein all of the relevant telephone calls. I also have included parenthetical comments relating to the conversations which contain my own and other law enforcement agents' interpretation of the coded language being used by the Target Subjects. These interpretations are based on my own experience investigating narcotics traffickers and my familiarity with the facts gathered thus far during this investigation. In addition to the intercepted phone calls, I have also included summaries of I have included information about the physical surveillance law enforcement agents have conducted of the Target Subjects in conjunction with wire interceptions and seizures of heroin and cocaine that took place during the interception of wire communications.

**B. LEADER OF THE ORGANIZATION: LEONEL ESMEDY GUERRA-PIMENTEL, a.k.a. "Leo," a.k.a. Jose Alfredo Santiago ("GUERRA")**

8. GUERRA is the user of the TARGET TELEPHONES and is believed to be a the leader of a cocaine and heroin distribution group operating in the Boston, MA area. Agents believe that GUERRA was referred or addressed by others during the course of Title III wire interceptions as "Leo." Prior to the initiation of wire interceptions, the confidential sources of information detailed in the wiretap affidavits of SA Tully did not provide any information regarding GUERRA or his associates being involved in the distribution of heroin. However, since the interception of wire interceptions over the TARGET TELEPHONES, it has become apparent that GUERRA was actively involved in the distribution of not only cocaine, but heroin. Based on intercepted conversations, it also appeared that GUERRA was obtaining significant quantities of heroin from a Colombian male known as "Colo." For example, on March 8, 2005, at 3:30 p.m., GUERRA received an incoming call over TARGET TELEPHONE #2 from "Colo" who was calling from 617-763-1127, subscribed to Luis F. Carvajal (CARVAJAL), 70 Readville St. #A, Hyde Park, MA. "Leo" (GUERRA) said everything went fine with the "curtain" (the cut for the heroin), better than the one from before (the previous supply of heroin which was bad). "Colo" (the Colombian) said that was important. Leo stated he wanted to meet with Colo tonight. Colo said he would call Leo tonight because he (Colo) was getting

"something" (some more heroin) today but did not know at what time it would arrive. Leo then told Colo to call him back when he had that (heroin) at hand. Colo asked Leo how much he wanted to "borrow" from him (how much heroin he wants to be "fronted," provided on consignment, from Colo). Leo said he first had to square things away (pay for the previous supply of heroin) and then he would have a response for Colo (about how much heroin he wanted).

**C. MARCH 19, 2005 ARREST OF LUIS FERNANDO CARVAJAL, a.k.a "El Colo" ("CARVAJAL") and EDISON JARAMILLO, a.k.a. Roberto Felicano ("JARAMILLO")**

9. Agents believe that LUIS FERNANDO CARVAJAL is a Colombian male who was referred to or addressed by others as "El Colo" during Title III interceptions. CARVAJAL was intercepted speaking with GUERRA from telephone number (617) 763-1127, subscribed to Luis F. Carvajal, 70 Readville St. #A, Hyde Park, MA and having coded drug related conversations on numerous occasions. As further described below, on March 19, 2005, GUERRA and CARVAJAL arranged over the wiretap for CARVAJAL to deliver approximately 700 grams of heroin to GUERRA. Subsequently, MSP arrested CARVAJAL and EDISON JARAMILLO in a Astro Van that was later found to contain 700 grams of heroin.

10. At approximately 1:05 p.m., on March 19, 2005, Sergeant Duggan saw a Hispanic male later identified as CARVAJAL enter a previously identified Chevrolet Astro Van in the area of 37 Hamilton Street in Dorchester, MA. Sergeant Duggan observed several people in the van which then left and was followed to the

Braintree Plaza Shopping Center. A female and several children left the van after it stopped in the parking garage. At about 2:58 p.m. SA Hersey observed CARAVAJAL walking in the garage area. SA Hersey called telephone number (617) 763-1127, the number known to be used by "El Colo" during the investigation to facilitate the sale of heroin. As the telephone was ringing, SA Hersey observed CARAVAJAL remove a cellular telephone from his pocket and answer it. SA Hersey saw and heard CARAVAJAL talking on the telephone both in person, as he was only twenty feet away, and over his telephone. SA Hersey hung up the telephone after a brief conversation and saw CARAVAJAL in turn hang up his telephone.

11. Around the same time, on the same day, March 19, 2005, TFA Geibel saw a Hispanic male, later identified as EDISON JARAMILLO arrive at 49 John Street in Malden, MA in a previously identified maroon Toyota Camry and exit the car and enter 49 John Street. At about 2:49 p.m. TFA Geibel saw JARAMILLO exit 49 John Street and enter the Camry departing the area with TFA Geibel and other officers following him.

12. During an intercepted call the same day, March 19, 2005, at 5:50 p.m., GUERRA asked "El Colo" (CARAVAJAL) what he had for him of "that" (believed to be heroin). CARAVAJAL responded by stating "700 pesos" (believed to be 700 grams of heroin). Surveillance was then established at 37 Hamilton Street in Dorchester, MA at 7:15 p.m. On two intercepted calls at 7:18 p.m. and 7:54 p.m. CARAVAJAL and GUERRA make arrangements for the



delivery at 8:30 p.m. and then at 9:00 p.m. At about 8:12 p.m. Officer Walsh saw CARAVAJAL and a female exit 37 Hamilton Street and go to the Astro Van. The female appeared to retrieve an item from the van and return to 37 Hamilton Street. CARAVAJAL left the area in the Astro Van and was followed at about 8:25 p.m. by officers to the John Eliot Square area of Roxbury, MA. Five minutes later, SA Dorsey observed the Astro Van depart the area of 14 John Eliot Square with two occupants in it.

13. At approximately 8:41 p.m. the Astro Van was observed to be proceeding on Route 93 south when MSP Trooper Bazzinotti observed the van commit a motor vehicle violation and stopped the Astro Van on the Bryant Avenue off ramp for the violation. Trooper Bazzinotti identified the driver of the van as CARVAJAL and the sole passenger as Roberto Feliciano (who was then later identified through fingerprints as EDISON JARAMILLO). Trooper Bazzinotti received consent from CARVAJAL to search the vehicle. During the traffic stop, Trooper Bazzinotti observed a finger of heroin (approximately 5 grams of suspected heroin) in plain view on the rear passenger seat of the van. Following this observation, MSP troopers detained CARVAJAL and JARAMILLO and searched the van. Inside the bag of a vacuum cleaner, Trooper Bazzinotti found approximately 700 grams of suspected heroin (believed to be the "700 pesos" that CARVAJAL would have delivered to GUERRA). The substances was later field tested and the results were positive for heroin.

14. At 9:10 p.m. on March 19, 2005, Sergeant Duggan located

JARAMILO's maroon Toyota Camry parked across the street from 14 John Eliot Square in Roxbury. This is the area that CARAVAJAL was followed to from Hamilton Street where a second individual, later determined to be JARAMILO was seen in the Astro Van. Following this seizure of heroin, the same day, March 19, 2005, during an intercepted call at 9:15 p.m., GUERRA told MARCIAL to call "El Colo" (CARAVAJAL) because he has been waiting for him (CARAVAJAL) and he was late and not answering his telephone calls. Thereafter, State criminal charges were brought against both CARVAJAL and JARAMILLO in Norfolk County arising from the seizure of the 700 grams of heroin.

15. Following the arrest of both CARVAJAL and JARAMILLO, law enforcement agents obtained recorded telephone conversations from the Norfolk House of Corrections in Dedham between EDISON JARAMILLO and his girlfriend CARMEN LOPERA. During the recorded jail calls, JARAMILLO directed LOPERA in the location of narcotics, method, and contacts for the operation. At the beginning of each call, there is a warning that the telephone call is being recorded that is provided in Spanish. JARAMILLO and LOPERA are speaking Spanish to each other during the conversations. All of the calls are from the access number provided to JARAMILLO to use to make telephone calls are to LOPERA on the cellular telephone and indicate that it is "Eddie" (JARAMILLO) calling for "Carmen" (LOPERA). Additionally, LOPERA commences talking to GUERRA on TARGET TELEPHONE #2 in which agents believe she is continuing JARAMILLO's operation. Based on

both these recorded jail calls between JARAMILLO as well as intercepted wiretap calls between LOPERA and GUERRA, agents believe that LOPERA continued JARAMILLO's heroin delivery operation once JARAMILLO was arrested and incarcerated on state charges at the Norfolk County House of Corrections. The following are some examples of the intercepted conversations wiretap and jail calls.

16. During an intercepted call on March 23, 2005, at 11:30 a.m., GUERRA received an incoming call from "Marcial" (GONZALEZ-ORTIZ). Marcial told Leo that some people were caught; that "Colo" (LUIS CARVAJAL) had problems. Leo asked Marcial how come. Marcial said that the wife of the other guy (believed to be LOPERA) is over at the grocery store; that he (Colo) told her to go over there (to the grocery store) to have Carlos call him (Marcial); for him (Marcial) to go over there (to the grocery store). Marcial added that it seemed like she told him (Carlos) that it was regarding the money. Leo told Marcial that he would call him back. Marcial acknowledged.

17. During an intercepted jail call for the Norfolk County House of Correction call on March 24, 2005, at 1:13 a.m. JARAMILLO asked LOPERA the location of some drug proceeds. Carmen (LOPERA) said they went over there (to the stash location) and that there was nothing there. Eddie (JARAMILLO) asked what does she mean and she said there was nothing, none of the girl's little rings (believed to be drug proceeds). Eddie asked why. Carmen said she did not know what happened, that they had been

calling César (believed to be an associate of GUERRA), and that for her, the only explanation was that it was him (César). Eddie asked how would he have known about it. Carmen said he was the only one that knew that the apartment was the one (where they kept the drug proceeds). She said she was sure because Andrés had gone at noon with the man to fix the lock as they had lost the keys, and the man fixed it. Carmen said she told him she would go with him, because "they weren't going to go get the girl's little rings," so they went and found nothing. Eddie asked what was inside. Carmen says "a lot of cut, a lot of the napkins strewn about, the things opened, everything...". Eddie then asked about the stove and directed Carmen to double check because "everything is in a red bag" (believed to be drug proceeds). Later, Carmen assured Eddie that they would be able to get the money.

18. During an intercepted jail on March 24, 2005, at 1:21 a.m. Carmen (LOPERA) talked to JARAMILLO about money that she was in the process of collecting from people (who are believed to be JARAMILLO's drug customers). For example, Carmen asked Eddie if he (JARAMILLO) was going to have a brother-in-law put to work. Eddie said yes, that he (the brother in law ) should get going with "that". Eddie asked Carmen if she could negotiate with him. Carmen said that the other guy did not want to cooperate. Eddie said he should "cooperate" (with paying a prior drug debt) with her but not to get her in trouble. Eddie asked Carmen if she had all the numbers there (believed to be a drug ledger). Carmen

responded that she would give him the little notebook. Eddie said he should look around for as much as he can, that he should call, that those people owe him a lot of money (referring to drug customers who owe JARAMILLO money). Carmen said Eddie should write it down or "copy it" for her (the amount of money owed for drugs). Eddie said, yes, at any rate those two pesitos are small. At the end of the call, Eddie reminds Carmen to help him out and she said she would do everything.

19. During a jail call at the Norfolk County House of Correction call on March 24, 2005, at 1:58 a.m. Carmen (LOPERA) talked to JARAMILLO about descriptions of people that are from "our part" or "our side." During the call, Carmen told Eddie that she has some good news. Eddie asks if there were "two bags". Eddie said there was some very expensive clothes there. Eddie then reminded Carmen that when she saw that guy tomorrow (believed to be GUERRA) to tell him you had left a request with him (GUERRA), but to please give you the money at once, that you need it immediately, and be careful, those "shirts," you know, one goes at 30 (believed to be \$30,000) and another zero, you know? 30 and another zero Carmen asks "Is it going at 30?" and Eddie responds 30 and you add another zero. Eddie said the shirts are expensive and there is one that is "Super-expensive." Toward the end of the call, Eddie directed Carmen to look at the notebook (drug ledger) and check the numbers there to see what is outstanding.

20. During an intercepted wiretap call the same day, on

March 24, 2005, at 5:11 p.m., GUERRA received an incoming from "Marcial" (GONZALEZ-ORTIZ). Marcial said he talked to Carmen (LOPERA) the girl and she wanted to know if Leo can meet with her at 7:00 because she has something to tell Leo very important in person. Leo said okay.

21. During an intercepted call the next day, March 25, 2005, at 3:33 p.m., Andres (an unidentified Hispanic male referred to the jail house calls between LOPERA and JARAMILLO) uses GUERRA's telephone to call Carmen (LOPERA) and she warns him to be careful. Carmen asked Andres who did he go with to get "that" (believed to be drugs) over there, and Andres explained that he went alone. The two then discussed a money payment in which Carmen tells Andres to ask them for the money. Andres asked Carmen if she had the 1615 and Carmen says that it is 16,500 plus six, plus the other thing (believed to be payment of \$16,500 for the delivery of 300 grams of heroin plus \$600 for the cut). Carmen reminded Andres that he must charge for the delivery because the amount is so small and to tell GUERRA about the money.

22. During an intercepted call on March 26, 2005, at 2:00 p.m., GUERRA received an incoming call from Carmen (LOPERA) who was calling from 781-420-2174, subscribed to Christina Lopera, 49 John St. Apt.6, Malden, MA. Carmen identified herself. Carmen asks when they (Carmen and Leo) would be getting together. Leo said that he (Leo) would call her at about 7:00. Leo says that he (Leo) was waiting on some money and that he (Leo) would call

her (Carmen) right away so that she (Carmen) would go to pick it up. Carmen tells Leo to make it as early as possible because she (Carmen) had company. Leo acknowledges. Carmen said that she would await his call.

23. During an intercepted wiretap call the next day, March 27, 2005, at 1:27 p.m., GUERRA called Carmen (LOPERA) at telephone number 781-420-2174. Leo apologized for not getting together with Carmen yesterday and asked when they (Leo and Carmen) could do so today. Leo said that he (Leo) would only give her (Carmen) \$10,000 and the he (Leo) will complete the other part on Tuesday. Carmen asked if Leo could give her (Carmen) the product (believed to be drugs) tomorrow. Leo replied that maybe but that it would be for sure on Tuesday, adding that he (Leo) did not want to lie to her (Carmen). Leo explained that he (Leo) would not be able to complete the money yesterday and that he (Leo) only had about \$10,000 and some. Carmen said that Tuesday was too late because things were very serious and that she (Carmen) needed to take that (money) urgently. Leo said that he (Leo) would do everything possible to get it (money) to her (Carmen) tomorrow. Carmen said that she (Carmen) was counting on their part in order to hand that (money) over tomorrow. Leo said that he (Leo) would give her \$10,000 today and the 6,500 tomorrow at about 5:00.

24. During an intercepted wiretap call on March 28, 2005, at 7:42 p.m., GUERRA received a call from Carmen (LOPERA) and asked where she was. Carmen said that she thought that it was

too late already because she had to take a train and buses for transportation and it was raining. Carmen explained that she needs "that" (believed to be money owed for drugs) urgently and asked if he had the receipts (believed to be money), and GUERRA agreed to lend her money and they agree to meet at 10:00 a.m., and that Carmen would call him at 9:00 a.m.

25. On March 28, 2005 agents monitoring the Target Telephones set up surveillance of LOPERA during her discussions with GUERRA concerning a sum of money owed to JARAMILLO by GUERRA. During an intercepted call on March 29, 2005, at 9:26 a.m., GUERRA receives a call from Carmen (LOPERA) who is calling from 781-420-2174, subscribed to Christina Lopera, 49 John St. Apt. 6, Malden, MA. Leo says that he (Leo) is going to call the guy (believed to be FERNANDO HERNANDEZ-GONZALEZ, a.k.a. "Nata," a runner for GUERRA) because he (Nata) was at home and he (Nata) had the money in the car. Leo said that he (Leo) would get the money and then call her (Carmen) in order to agree on a meeting time.

26. During an intercepted jail call for the Norfolk County House of Correction call the next day, on March 29, 2005, at 2:16 a.m. Carmen (LOPERA) talked to JARAMILLO about whether she had been paid the rest and they discuss the amount. Eddie asked Carmen to ask the guy (GUERRA) to lend her something. Carmen told Eddie to be careful, and he said not to worry because he was not going to compromise her.

27. During an intercepted call on March 29, 2005, at 9:56



a.m., GUERRA received a call from Carmen (LOPERA) and said that he was waiting for him (Nata) to arrive (with the money). Carmen said that she had an appointment in the afternoon and hoped that GUERRA would call back because she wanted to pick "that" (believed to be money) first. At 10:00 a.m. surveillance was set up in the area of 162 Garfield Street in Hyde Park, MA.

28. During an intercepted call on March 29, 2005, at 10:52 a.m., GUERRA told Nata to come over because he was going to lend the money to that Columbian guy (believed to be JARAMILLO) to see if he gets out (believed to be on bail). GUERRA said that he was going to call that woman (LOPERA). At about 11:45 a.m. Detective Walsh saw HERNANDEZ, a.k.a. "Nata" arrive at GUERRA's residence located at 162 Garfield Street in Hyde Park in a blue Audi that he was previously seen driving. Detective Walsh saw GUERRA and HERNANDEZ depart the area together in the blue Audi at about 11:55 a.m.

29. During an intercepted call on March 29, 2005, at 11:53 a.m., GUERRA called Carmen (LOPERA) and said that they should get together at 1:30 p.m. at Forest Hills. Following this call, there are several more wiretap calls during which GUERRA and LOPERA coordinate the meeting at Forest Hills.

30. At about 12:27 p.m. on the same day, SA Doyle saw Carmen (LOPERA) carrying a light blue backpack depart 49 John Street in Malden, MA and walk to the bus stop with a Hispanic male. SA Doyle saw them enter a bus and depart with surveillance following the bus. They were surveilled to the train station

where they entered a train bound for Forest Hills at about 12:45 p.m. At approximately 1:21 p.m., TFA Geibel saw LOPERA and the unknown Hispanic male exit the train at the Forest Hills train station. Approximately fifteen minutes later SA Doyle and other agents saw GUERRA in a silver Honda that GUERRA was seen driving previously. LOPERA and the unknown Hispanic male entered GUERRA's car and it left the area. At approximately 1:45 p.m., Sergeant Duggan observed GUERRA's car at the next stop on the train line, Stonybrook train station on Boylston Street in Jamaica Plain, MA. He observed LOPERA and the unknown Hispanic male exit GUERRA's car and LOPERA appeared to have something in her hand. Photographs were taken of this surveillance.

31. During an intercepted jail call for the Norfolk County House of Correction call on March 30, 2005, at 2:02 a.m. Carmen (LOPERA) talked to JARAMILLO and again assured him that she was doing everything that she could. Eddie asked Carmen if Leo (GUERRA) already gave everything to her, and she confirms that Leo (GUERRA) did. Carmen added that GUERRA lent her something first. Eddie told Carmen to tell GUERRA that it was original and that she did not want any problems. Carmen said that she told GUERRA that the shirt was prettier than the other ones. Carmen also said that she told GUERRA to call her for anything, but that she and Eddie (JARAMILLO) were responsible. Eddie told Carmen to tell GUERRA that she did not know anything about that and tells her not to get into it.

32. During an intercepted call on April 2, 2005, at 3:42

p.m., GUERRA spoke with Carmen (LOPERA). Leo said that he (Leo) was working on "that" and that it was not easy getting rid of that (believed to drugs that Leo was selling to get money for Carmen). Leo said that he (Leo) just picked up something that was returned to him (Leo) (believed to be bad quality heroin). Carmen asked why Leo would take it (the heroin) back after so long and Leo replied that these are people that he (Leo) trusts and works with. Leo added that he (Leo) knew that these people were not going to do wrong by him. Toward the end of the call, Leo said that he (Leo) was being honest with them (LOPERA and JARAMILLO). Leo said that he (Leo) lent her (Carmen) money while barely knowing her (Carmen) and paid her (Carmen) for that work without him (Leo) taking out "1 gram."


33. During an intercepted jail call for the Norfolk County House of Correction call on April 3, 2005 at 1:41 a.m. Carmen (LOPERA) talks to JARAMILLO and continues to discuss selling shirts, the prices for them, and quantities.

#### **D. CONCLUSION**

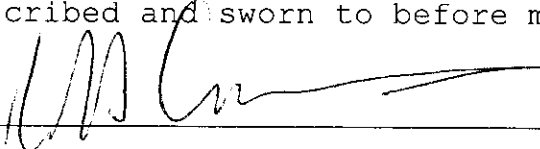
34. Based on the information contained in this affidavit, I submit that there is probable cause to believe that: (1) LUIS FERNANDO CARVAJAL, a.k.a. "El Colo," (2) EDISON JARAMILLO, a.k.a. "Roberto Feliciano," and (3) CARMEN LOPERA, a.k.a. "Christina Lopera" have committed the crime of conspiracy to distribute one kilogram or more of heroin, a Scheduled I controlled substance, in violation of Title 21, United States Code, Sections 846,

841(a)(1), and 841(b)(1)(B)(i) as set forth in the accompanying criminal complaint.

I declare that the foregoing is true and correct.

  
\_\_\_\_\_  
KEVIN O'NEIL  
Task Force Agent  
U.S. Drug Enforcement Administration

Subscribed and sworn to before me this 21<sup>TH</sup> day of April, 2005.

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MASSACHUSETTS

HON. ROBERT B. COLLINGS  
UNITED STATES MAGISTRATE JUDGE  
United States District Court  
John Joseph Moakley United States Courthouse  
1 Courthouse Way, Suite 6420  
Boston, Massachusetts 02210

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: \_\_\_\_\_ Category No. I Investigating Agency DEACity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Luis Fernando Carvajal Juvenile ☐ Yes ☒ NoAlias Name El ColoAddress 37 Hamilton St., Dorchester, MABirth date (Year 1967 SSN (last 4 \_\_\_\_\_ Se M Race: WHITE Nationalit HispanicDefense Counsel if Unknown Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Glen MacKinlay/Neil Gallagher Bar Number if \_\_\_\_\_Interpreter: ☒ Yes ☐ No List language and/or dialect: SPANISHMatter to be SEALED: ☐ Yes ☒ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody \_\_\_\_\_ in \_\_\_\_\_☒ Already in State Norfolk County ☐ Serving Sentence ☒ Awaiting Trial☐ On Pretrial Ordered \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☒ Complaint ☐ Information ☐ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony One

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date 4/21/05Signature of Glen A. MacKinlay

JS 45 (5/97) - (Revised USAO MA 3/25/02) 1 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Luis Fernando Carvajal

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21/846</u>	<u>conspiracy to distribute heroin</u>	<u></u>
Set 2	<u></u>	<u></u>	<u></u>
Set 3	<u></u>	<u></u>	<u></u>
Set 4	<u></u>	<u></u>	<u></u>
Set 5	<u></u>	<u></u>	<u></u>
Set 6	<u></u>	<u></u>	<u></u>
Set 7	<u></u>	<u></u>	<u></u>
Set 8	<u></u>	<u></u>	<u></u>
Set 9	<u></u>	<u></u>	<u></u>
Set 10	<u></u>	<u></u>	<u></u>
Set 11	<u></u>	<u></u>	<u></u>
Set 12	<u></u>	<u></u>	<u></u>
Set 13	<u></u>	<u></u>	<u></u>
Set 14	<u></u>	<u></u>	<u></u>
Set 15	<u></u>	<u></u>	<u></u>

ADDITIONAL INFORMATION:

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: \_\_\_\_\_ Category No. I Investigating Agency DEACity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Carmen Lopera Juvenile ☐ Yes ☒ NoAlias Name Christina LoperaAddress 49 John St., Apt 6, Malden, MABirth date (Year unk SSN (last 4 \_\_\_\_\_ Se F Race: Hispanic Nationalit Unknown

Defense Counsel if \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Glen MacKinlay/Neil Gallagher Bar Number if \_\_\_\_\_Interpreter: ☒ Yes ☐ No List language and/or dialect: SPANISHMatter to be SEALED: ☐ Yes ☒ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody \_\_\_\_\_ in \_\_\_\_\_☐ Already in State \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Ordered \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☒ Complaint ☐ Information ☐ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony One

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date 4/21/05Signature of Glen A. MacKinlay

JS 45 (5/97) - (Revised USAO MA 3/25/02) I 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Carmen Lopera

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21/846</u>	<u>conspiracy to distribute heroin</u>	_____
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:



**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: \_\_\_\_\_ Category No. I Investigating Agency DEACity Boston Related Case Information:County Suffolk Superseding Ind./ Inf. \_\_\_\_\_ Case No. \_\_\_\_\_  
Same Defendant \_\_\_\_\_ New X  
Magistrate Judge Case Number \_\_\_\_\_  
Search Warrant Case \_\_\_\_\_  
R 20/R 40 from District of \_\_\_\_\_**Defendant Information:**Defendant Name Edison Jaramillo Juvenile ☐ Yes ☒ NoAlias Name Robert FelicianoAddress 49 John St., Apt 6, Malden, MABirth date (Year 1979 SSN (last 4 7482 Se M Race: Hispanic Nationalit Unknown

Defense Counsel if \_\_\_\_\_ Address: \_\_\_\_\_

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Glen MacKinlay/Neil Gallagher Bar Number if \_\_\_\_\_Interpreter: ☒ Yes ☐ No List language and/or dialect: SPANISHMatter to be SEALED: ☐ Yes ☒ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**Arrest Date: March 19, 2005☐ Already in Federal Custody \_\_\_\_\_ in \_\_\_\_\_☒ Already in State Norfolk Cty - INS ☐ Serving Sentence ☒ Awaiting Trial☐ On Pretrial Ordered \_\_\_\_\_ on \_\_\_\_\_Charging Document: ☒ Complaint ☐ Information ☐ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony One

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date 4/21/05

Signature of \_\_\_\_\_

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Edison Jaramillo

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>21/846</u>	<u>conspiracy to distribute heroin</u>	<u></u>
Set 2	<u></u>	<u></u>	<u></u>
Set 3	<u></u>	<u></u>	<u></u>
Set 4	<u></u>	<u></u>	<u></u>
Set 5	<u></u>	<u></u>	<u></u>
Set 6	<u></u>	<u></u>	<u></u>
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Set 10	<u></u>	<u></u>	<u></u>
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Set 13	<u></u>	<u></u>	<u></u>
Set 14	<u></u>	<u></u>	<u></u>
Set 15	<u></u>	<u></u>	<u></u>

ADDITIONAL INFORMATION: